

1 Christina H. Wang, Esq.  
2 Nevada Bar No. 9713  
3 FIDELITY NATIONAL LAW GROUP  
4 1701 Village Center Circle, Suite 110  
5 Las Vegas, Nevada 89134  
6 Telephone: (702) 667-3000  
7 Facsimile: (702) 697-2020  
8 Email: christina.wang@fnf.com  
9 *Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 KELLY O. SHIMADA, TRUSTEE OF THE  
11 KELLY O. SHIMADA IRREVOCABLE  
TRUST.

Case No.: 2:18-cv-00527-APG-CWH

**STIPULATION AND  
ORDER TO DISMISS, TO REFUND  
BOND, AND TO RELEASE LIS  
PENDENS**

**Plaintiff.**

v.

1 711 NC PROPERTY TRUST, TRUSTEE FOR  
15 711 BASS LV PROPERTY TRUST;  
16 NEWPORT COVE CONDOMINIUM UNIT  
17 OWNERS ASSOCIATION; DOES I through X  
and BLACK AND WHITE CORPORATIONS  
I through X.

### **Defendants.**

20 IT IS HEREBY STIPULATED AND AGREED by and between Christina H. Wang, Esq.  
21 of the Fidelity National Law Group, counsel for Plaintiff Kelly O. Shimada, Trustee of the Kelly  
22 O. Shimada Irrevocable Trust (“Plaintiff”); and Jeff Brauer, Esq. of Brauer, Driscoll, Sun and  
23 Associates LLC, counsel for Defendants 711 NC Property Trust, Trustee for 711 Bass LV Property  
24 Trust, and Newport Cove Condominium Unit Owners Association, as follows:

IT IS HEREBY STIPULATED AND AGREED that this case shall be dismissed in its entirety with prejudice.

IT IS FURTHER STIPULATED AND AGREED that that each party shall bear their own

1 attorney's fees and costs.

2 IT IS FURTHER STIPULATED AND AGREED that Plaintiff's Notice of Lis Pendens,  
3 filed in this Court on March 22, 2018 (Doc 1-24) and recorded in the Official Records of the Clark  
4 County, Nevada Recorder on March 29, 2018 as Instrument No. 20180329-0002591, referring to  
5 the real property described therein and commonly known as 711 Bass Drive, Unit A, Henderson,  
6 NV 89014, APN 178-06-511-026, is hereby released from the record.

7 IT IS FURTHER STIPULATED AND AGREED that the \$2,500.00 total cash bond (Docs.  
8 15, 31), which Plaintiff tendered to the Court pursuant to the Orders granting the Preliminary  
9 Injunction (Doc. 30: \$2,500.00 total, including the \$500.00 previously tendered for the Temporary  
10 Restraining Order bond) and Temporary Restraining Order (Doc. 13: \$500.00, which was later  
11 included as part of the \$2,500.00 Preliminary Injunction bond), be returned to Plaintiff, and the  
12 bond requirement is hereby ended.

13 DATED this 31<sup>st</sup> day of May, 2018.

14 FIDELITY NATIONAL LAW GROUP

15 /s/ *Christina H. Wang*

16 CHRISTINA H. WANG, ESQ.  
17 Nevada Bar No. 9713  
18 1701 Village Center Circle, Suite 110  
19 Las Vegas, Nevada 89134  
*Attorneys for Plaintiff*

BRAUER, DRISCOLL, SUN AND  
ASSOCIATES

/s/ *Jeff Brauer*

JEFF BRAUER, ESQ.  
Nevada Bar No. 13834  
3333 East Serene, Suite 150  
Henderson, Nevada 89074  
*Attorneys for Defendants*

21 IT IS SO ORDERED.



22  
23 UNITED STATES DISTRICT JUDGE

24 Dated: May 31, 2018